

DIVISION OF MEASUREMENT STANDARDS COMMITTEE MEETING
Manganese Workshop II
January 17, 2013

Purpose of Meeting: To conduct a second workshop regarding a change to the NAC 590 Regulation (see **Attachment 1**) to include a manganese labeling requirement. The requirement language and placement thereof in NAC 590.063, has been revised by the LCB (LCB File Number 189-12) and is reflected below:

Section 3. In addition to the requirements set forth in subsections 1 and 2, any person who sells gasoline at retail shall, if the gasoline contains manganese or any compound containing manganese, post on the pump or other device for dispensing the gasoline a label which includes the following language:

This gasoline contains or may contain manganese.

Section 4. The label required pursuant to subsection 3 must:

- (a) Be legible and conspicuous;
- (b) Be at least as large as 3 inches wide by 2 ½ inches long; and
- (c) Consist of black ink on a background that is yellow or white.

In Attendance:

Bill Striejewski --- Nevada Bureau of Petroleum Technology
Dave Jones --- Nevada Division of Measurement Standards
Gina Grey --- Western States Petroleum Association, Petroleum Industry
John Sande --- Western States Petroleum Association, Auto & Petroleum Industry
Kevin Fast --- AFTON Chemical, Chemical Industry
Lawrence Wah --- Nevada Petroleum Marketers Association (CSA), Petroleum Industry
Lea Tauchen --- Nevada Retail Association, Retail Industry
Michael Hillerby --- Honda, Auto Industry
Miles Heller --- British Petroleum, Petroleum Industry
Nick Economides --- Chevron Corp., Petroleum Industry
Paul Anderson --- Thomas Petroleum, Petroleum Industry and Board of Agriculture
Peter Krueger --- Nevada Petroleum Marketers Association (CSA), Petroleum Industry

In General:

The Administrator of the Nevada Division of Measurement Standards conducted a second manganese workshop 9:00 – 10:20, January 17, 2013, to solicit comments, positions, feedback and impacts from the attendees and the public regarding manganese labeling. Comments and correspondence are attached for reference.

Each of the Attendees were asked to provide updated or new information.

Mr. Hillerby stated that the EPA does not allow ethanol and a metal additive to be mixed in gasoline (see **Attachment 3**); this specifically pertains to the mixing of the two in the Underground Storage Tank (UST). Mr. Hillerby expressed concerns regarding the challenges pertaining to delivery documentation and UST records when delivering a manganese gasoline. He also concurs with Mr. Heller's labeling language. Mr. Heller provided **Attachment 2**.

Mr. Wah reiterates that he is opposed to manganese labeling. Mr. Wah specified that the language was discriminatory, the proposed change is against the EPA law and violates the clean air act. This labeling change does not make sense to initiate if there will be no enforcement provision or follow-up. Mr. Wah further stated that the comment: "MMT is not used in other countries", was a false comment. Mr. Wah went further to list numerous countries that used MMT to include Canada and several in Europe.

Mr. Krueger stated he was against the labeling and that the labeling regulation change violated the Clean Air Act (see **Attachment 4**). Mr. Krueger further stated that federal law requires auto manuals to reflect notes regarding manganese additives (see **Attachment 4**). Additionally, he stated that this is a "misguided adventure". Mr. Krueger further interpreted the LCB File Number 189-12 language in item 3 conflicting with the labeling language. Labeling requirements will be incurred by the marketers - \$3.00 per label (see **Attachment 6**) for each pump/device. Mr. Krueger indicated that Mr. Hillerby stated at the first work shop that manganese was not approved in other countries. Mr. Hillerby stated he did not say that. Regarding stickering the pumps, Mr. Krueger stated that the station owners may be confused as to whether they will have to sticker or not for each gasoline load that is deposited in the fuel storage tank.

Mr. Anderson, Board of Agriculture member, stated that the manganese workshop I meeting minutes be sent to all attending; this includes from the first meeting.

Mr. Heller stated that he does not like the State's proposed labeling language and submitted a letter proposing alternative language (see **Attachment 2**). Mr. Heller indicated he could support Mr. Economides' alternative labeling language; Mr. Economides' submitted alternative language during this meeting (**see Attachment 5**).

Ms. Grey stated that WSPA was abstaining from commenting on the labeling requirement. Ms. Grey also recommended that the minutes, with attachments, be available to all and posted on a web site for reference. The work shop committee concurred.

Mr. Economides emailed labeling language that deviated from the Department of

Agriculture's labeling language and the LCB revised language (**see Attachment 5**). Chevron does not support the proposed LCB labeling language.

Kevin Fast and John Sande wished not to provide comment.

For the second public comment period two individuals spoke.

Mr. Wah reiterated Mr. Krueger's comment stating that he does not understand why the labeling process is proceeding; Mr. Wah stated this action conflicts with the EPA law (see **Attachment 4**). The EPA law is contained in the Clean Air Act, Section 211(c)(4). Mr. Wah emphasized that there are no issues regarding manganese labeling either nationally or globally.

Mr. Hillerby specified that his clients - the auto industry (see **Attachment 3**) - do not agree with Mr. Krueger's and Mr. Wah's interpretation of the EPA's regulation.

The meeting adjourned at 10:20.

Attachments:

Attachment 1 – LCB File No. 189-12 – revised language

Attachment 2 – BP Letter – Miles Helier authored

Attachment 3 – Global Automakers and Auto Alliance Letter

Attachment 4 – MMT Global Perspective and Federal Manganese Preemption Document

Attachment 5 – Chevron's Alternate Language Document

Attachment 6 – Instant Sign Center Estimate

**PROPOSED REGULATION OF
THE STATE BOARD OF AGRICULTURE**

LCB File No. R189-12

January 15, 2013

EXPLANATION – Matter in *italics* is new; matter in brackets [~~omitted material~~] is material to be omitted.

AUTHORITY: § 1, NRS 590.070.

A REGULATION relating to gasoline; requiring a person who sells at retail gasoline which contains manganese or any compound containing manganese to post on the pump or other device for dispensing the gasoline a label indicating that the gasoline contains or may contain manganese; and providing other matters properly relating thereto.

Section 1. NAC 590.063 is hereby amended to read as follows:

590.063 1. The octane rating number of the gasoline from the proof of transfer must be posted on the pump or other device for dispensing the gasoline.

2. The octane rating number of the product that is in the pump or other device for dispensing gasoline must not be lower than the octane rating that is posted on the pump or device.

3. *In addition to the requirements set forth in subsections 1 and 2, any person who sells gasoline at retail shall, if the gasoline contains manganese or any compound containing manganese, post on the pump or other device for dispensing the gasoline a label which includes the following language:*

This gasoline contains or may contain manganese.

4. The label required pursuant to subsection 3 must:

(a) Be legible and conspicuous;

(b) Be at least as large as 3 inches wide by 2 1/2 inches long; and

(c) Consist of black ink on a background that is yellow or white.



Miles T. Heller

Senior Advisor, Regulatory Fuels Issues

BP West Coast Products LLC
2350 East 223rd St.
Carson, CA 90810

January 4th, 2013

Attn: Dave Jones,
Administrator of the Division of Measurement Standards
Nevada Department of Agriculture
2150 Frazer Avenue
Sparks, Nevada 89431

sent via e-mail

RE: Comments on Proposed Amendments to NAC 590 re Manganese Additive Labelling

Dear Mr. Jones,

BP appreciates the opportunity to provide the following comments in regards to the Division of Measurement Standards' proposal to require labelling of fuel pumps where the fuel dispensed contains, or may contain, manganese or manganese compounds.

These comments are consistent with those BP presented at the workshop on November 13th, 2012; and are submitted in advance of the deadline of January 10, 2013 and the upcoming workshop on January 17th, 2013.

BP is generally supportive of manganese additive labelling provided the regulatory language reflects the following three concepts:

1. Labelling is only required when manganese is intentionally added to the fuel being dispensed. It is not necessary to label to indicate that manganese is not present.
2. Requires adequate product transfer document (PTD – typically the bill of lading) requirements to communicate to marketers and retailers when additive is present.
3. The label should provide meaningful information to consumers enabling them to make an informed decision before they purchase the fuel.

The most recent language proposal for the label is an improvement over the prior version and we appreciate the Division making this change. The current proposal reads "this fuel contains or may contain manganese" while the prior version simply stated that the fuel "may or may not contain" the additive. This new label language, coupled with regulatory language that makes it clear that a dispenser label is only required to be labelled when manganese is present in the fuel, will satisfy concept no. 1.


bp

Regulatory language is also needed to require the fuel provider who added the manganese, and any intermediate marketers/transporters, to include a statement on the PTDs that the fuel, in fact, contains manganese. This will ensure that the station operator/retailer knows when to affix a label to the dispenser and protects the owner from related liability if unaware that manganese was added.

Because the new label language provides some definitive information about the presence of manganese, the proposal is consistent with concept 3 above, but does not go far enough in our opinion. This is because the consumer will not know what actions to take based on this information alone. At a minimum, the label should inform the consumer to consult their owner's manual prior to fuelling as some auto manufacturers recommend against using fuel containing manganese or manganese additives. This type of information is what the consumer needs to make a clear choice.

We appreciate the opportunity to submit these comments and look forward to participating in the January 17th workshop.. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Miles Heller', followed by a long horizontal line.

Miles Heller
Senior Advisor, Regulatory Fuels Issues

David Michael Jones

From: Heller, Miles T [Miles.Heller@bp.com]
Sent: Friday, January 04, 2013 11:06 AM
To: David Michael Jones
Subject: BB Comments re MMT labelling

Attachments: BP comments to NDMS re MMT labeling 1-4-13.pdf

Dave – attached comments regarding the proposal ahead of the 1-10-2013 comment deadline for consideration. Please confirm receipt and I am still interested in getting confirmation from you about a call-in option for the 1-17-13 meeting in time to make travel arrangements if needed.



BP comments to
NDMS re MMT lab...

Miles Heller, BP
Senior Advisor, Regulatory Fuels Issues
Cell - (714) 519-9292



GlobalAutomakers 

November 30, 2012

Mr. David M. Jones
Administrator
Bureau of Weights and Measures
Nevada Department of Agriculture
2150 Frazer Avenue
Sparks, NV 89431

RE: Metallic Additives for Gasoline (Follow up to November 13, 2012 Workshop)
[Submitted electronically with all enclosures attached on November 30, 2012]

Dear Mr. Jones:

This letter confirms information provided by the representatives of the Association of Global Automakers¹ and the Alliance of Automobile Manufacturers² at your Department's November 13, 2012 public workshop on this matter. Global Automakers and the Auto Alliance together represent all major auto manufacturers selling passenger cars and light trucks in the U.S. Our members appreciate the opportunity provided by the workshop and look forward to a constructive outcome soon on this issue of great concern.

1. No Automaker Supports Use of Metallic Additives in Gasoline

As you are aware, automakers in the United States, and indeed world-wide, have had longstanding and ongoing opposition to the use of metallic additives, such as manganese or MMT

¹ Global Automakers members include Aston Martin, Ferrari, Honda, Hyundai, Isuzu, Kia, Maserati, McLaren, Nissan, Peugeot, Subaru, Suzuki, and Toyota.

² Auto Alliance members include BMW, Chrysler, Ford, General Motors, Jaguar Land Rover, Mazda, Mercedes-Benz, Mitsubishi, Porsche, Toyota, Volkswagen, and Volvo.

(Methylcyclopentadienyl Manganese Tricarbonyl), in gasoline³. In numerous studies, the prolonged, consistent use of manganese-based gasoline additives has been shown to result in damage to vehicles, such as premature spark plug fouling and damage to emissions control equipment, including catalytic converters. Detailed information on these studies has been provided previously to the Department. We understand that this information is available from Mr. Bill Striejewski at the Department of Agriculture. This information is incorporated by reference. Please advise if you need additional copies of any of this information.

As we noted at the workshop, these studies are still relevant to today's emerging vehicle engine and emission control technologies and materials. Additional data are not needed to establish the ongoing risk documented in these studies. Thus we would have preferred continuing the ban on manganese based additives in Nevada.

2. Absent a ban on use, at a minimum, consumers have a right to know that metallic additives are present in their fuels, and to be advised to check their vehicle owner's manuals.

For many years, various fuel surveys have not identified metallic additives or MMT as present in gasoline in the U.S. However, given the apparent interest on the part of some Nevada gasoline distributors and marketers to now use manganese based gasoline additives, such as MMT, we believe it is imperative that *at a minimum* the Nevada Department of Agriculture adopt and enforce consumer labeling requirements for gasoline pumps which dispense gasoline containing manganese or MMT. Disclosure through the use of a pump label is the only means of informing consumers so they can make an informed choice when purchasing gasoline. Global Automakers and the Auto Alliance fully support a requirement for labeling pumps which dispense gasoline containing intentionally added manganese or MMT.

Because of the potential for vehicle damage, many automakers include information in their owner's manuals recommending against the use of gasoline containing manganese or MMT. Enclosed is a sample of the owner's manual information for several major automakers, including Chrysler, Ford, General Motors, Honda, Subaru, and Toyota. Together these automakers (and others that recommend against metallic additives) comprise the vast majority of new vehicle sales in Nevada.

In order for consumers to make informed choices concerning the fuel they are purchasing, they need to be made aware if the fuel contains manganese or MMT, that using it can result in damage, and that they should check their owner's manual before fueling. The addition of a pump label is inexpensive and results in little administrative burden for the Department or the fuel marketers.

3. Joint OEM Proposal for Pump Labeling

At the workshop on November 13, 2012, our representatives provided the following documents for your consideration (copies enclosed):

³ See enclosed 4th edition of the Worldwide Fuel Charter, especially the section on category 4 which applies to gasoline sold in markets with advanced vehicle emissions controls such as the U.S. A fifth edition is expected to be published in early 2013, and will continue to recommend against metallic additive use.

1. A redline/strikeout version of portions of NAC Chapter 590 with amendments to provide for:
 - a. Requirement for labeling dispensers for fuel which may contain manganese or MMT; see proposed new section 590.065 (8)
 - b. Requirement for disclosure of manganese or MMT in fuel transfer documents; see proposed new section 590.061 (4)(e)
 - c. Clarification of enforcement authority for labeling and recordkeeping; see proposed amendments to section 590.070
2. A sample pump label containing the language included in our proposed amendments to section 590.065

As explained at the workshop, the first provision (1.a) noted above would address the label and its content. The second provision (1.b) above would require the disclosure information on fuel transfer documents to allow marketers to know when they need to affix pump labels and the Department the paper trail needed to enforce the labeling requirement. The third provision (1.c) would clarify the Department's enforcement authority. These elements, along with the sample pump label, are all necessary to ensure adequate and correct information for consumers.

4. Responses to the Workshop Discussion

At the workshop several points were discussed that are worthy of further mention.

First, one workshop attendee provided alternative language for the pump label and suggested that it would be worthwhile for interested parties to agree on a simpler label than we proposed. We are open to further discussions on the specific label language, as long as the label is prominently displayed on the pump in a manner in which it will get consumers' attention and the basic messages include:

1. Disclosure of presence of manganese or MMT
2. The potential for damage if used
3. Referring the consumer to his/her owner's manual

Second, another attendee raised a question regarding automakers' efforts in other States to require similar pump labels for gasoline containing manganese or MMT. Automakers and others conduct fuel surveys across the U.S. to gauge the quality of gasoline sold regionally and nationally. Despite EPA approval in the mid-1990s of MMT as a gasoline additive for some gasoline sold in the U.S., to date we had not been aware of any use of manganese additives in gasoline sold in the U.S. Metallic additives, including MMT, are prohibited in Federal reformulated gasoline (which represents about one-third of the U.S., non-California gasoline pool) and in all gasoline sold in California.

To our knowledge, Nevada is the first State where distributors and marketers have shown any significant interest in using manganese or MMT additives. However, based on the discussions in Nevada, we are currently reviewing the markets in other nearby western states and across the U.S. to determine whether outreach, or at a minimum, similar labeling requirements, may be warranted. Additionally, EPA regulations do not allow refiners or blenders to use MMT and ethanol in the same batch of gasoline.⁴

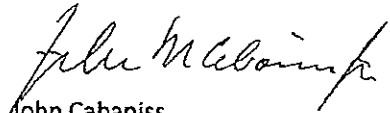
⁴ Telecon with EPA staff on November 26, 2012.

The EPA renewable fuels standard has resulted in the widespread use of ethanol in gasoline across the U.S., and as a result there is little use of MMT.

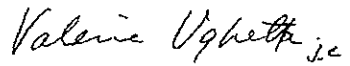
Third, another attendee raised a question concerning "over-the-counter" packaged gasoline additives for consumer use, some of which contain manganese or MMT. While automakers have not taken a position on the use of manganese in over-the-counter additives, we suspect that such products are seldom used on a continuous basis by consumers. Instead, these products are usually used intermittently. While automakers don't support manganese use even intermittently, we have no data on which to gauge the impacts of such additives when used occasionally.

Thank you for the opportunity to comment on this important consumer issue in Nevada. If you need further information, please feel free to contact either John Cabaniss of Global Automakers (jcabaniss@globalautomakers.org; (202) 650-5562) or Valerie Ughetta of the Auto Alliance (vughetta@autoalliance.org; (202) 326-5549).

Sincerely yours,



John Cabaniss
Director, Environment & Energy
Global Automakers



Valerie Ughetta
Director, Automotive Fuels
Auto Alliance











cc: Bill Striejewski, NV Department of Agriculture

Enclosures

Worldwide Fuel Charter (4th ed.)
Examples of Current Vehicle Owner's manual language
Proposed regulatory amendments
Sample label

Faber D. Krueger - MEM & CSA 1/17/13

Global perspective mmt[®] is Accepted and Approved by the Following:

- | | | |
|---|--|--|
|  Australia |  European Common Market |  United Kingdom |
|  Argentina |  France |  United Nations |
|  Canada |  South Africa |  United States of America |
|  China | | |

and is allowed under

- Euro specifications – REACH registration 2010
- US EPA regulations
- Far East specifications
- African specifications

Federal Preemption of the Proposed Nevada Labeling Requirement For Gasoline Containing Manganese

- The NV Department of Agriculture's proposed labeling of manganese containing gasoline creates a clear question of federal preemption by imposing a state control for the purpose of motor vehicle emission control that is not "identical" to federal law
- The proposed labeling requirement is not consistent with consumer warranty rights concerning use of gasoline

Motor Vehicle Emission Control

Section 211(c)(4) of the Clean Air Act expressly provides that "no State (or political subdivision thereof) may prescribe or attempt to enforce, for purposes of motor vehicle emission control, any control or prohibition respecting any characteristic or component of a fuel or fuel additive in a motor vehicle or motor vehicle engine – (i) if [EPA] has found that no control or prohibition of the characteristic or component of a fuel or fuel additive under paragraph [§ 211(c)(1)] is necessary and has published his finding in the Federal Register, or (ii) if the [EPA] has prescribed under paragraph (1) a control or prohibition applicable to such characteristic or component of fuel or fuel additive, unless State prohibition or control is identical to the prohibition or control prescribed by the [EPA]." See 42 U.S.C. § 7545(c)(4)(A) (emphasis added).

In 1994, EPA promulgated comprehensive regulations establishing control of the characteristics of the two kinds of gasoline sold throughout the United States – namely, reformulated gasoline and conventional gasoline. See 59 Fed. Reg. 7716 (1994). When EPA promulgated the 1994 regulations, EPA stated that

[t]he national scope of gasoline production and distribution suggests that federal rules should preempt State action to avoid an inefficient patchwork of potentially conflicting regulations. Indeed, Congress provided in the 1977 Amendments to the Clean Air Act that federal fuels regulations preempt non-identical State controls except under certain specified circumstances (see section 211(c) (4) of the Clean Air Act). EPA believes that the same approach to federal preemption is desirable for the reformulated gasoline and anti-dumping programs.

59 Fed. Reg. at 7809. For this reason, EPA stated that it was preempting all "dissimilar State controls" regulating gasoline content. *Id.*

In 1995, EPA authorized the use of manganese in conventional U.S. gasoline at 1/32 gram manganese per gallon (or 8.3 milligram manganese per liter). See 60 Fed. Reg. 36414 (July 17, 1995). When EPA authorized use of manganese in conventional U.S. gasoline, it did so by publishing the authorization in the Federal Register. EPA chose not to condition the authorization to use manganese with any sort of fuel pump labeling requirement. No labeling was necessary because EPA specifically determined under § 211 of the Clean Air Act that use of manganese at the specified level "would not 'cause or contribute to a failure of any emission control device or system' in a vehicle to achieve compliance with the emission standards for which the vehicle was certified." *Id.* (emphasis added). Refiners, fuel

blenders and marketers who opt to use manganese under the federal authorization can therefore do so without having to label the gasoline as containing manganese.

By contrast, whenever EPA has wanted to impose a federal labeling requirement under § 211 of the Clean Air Act, it has done so explicitly as it did with respect to its decision authorizing use of ethanol up to 15 percent by volume in gasoline ("E15") in some, but not all, motor vehicles. *See* 76 Fed. Reg. 4,662, 4,682 (January 26, 2011) ("Fuel and fuel additive manufacturers subject to this partial waiver must submit to EPA a plan, prior to introduction of the fuel or fuel additive into commerce" which includes, among other things, "[r]easonable measures for ensuring that any retail fuel pump dispensers that are dispensing a gasoline produced with greater than 10 vol% ethanol and no more than 15 vol% ethanol are clearly labeled for ensuring that consumers do not misfuel the waived gasoline-ethanol blend into vehicle or engines not covered by the waiver."); 75 Fed. Reg. 68,094, 68,148 (November 4, 2010) ("Any fuel or fuel additive manufacturer using this partial waiver must ensure labeling of any dispensers of this gasoline ethanol blend."). EPA imposed the labeling requirement because it determined that E15 when used in older vehicles, nonroad engines, and heavy duty engines might cause failure of emission control systems. *See* 75 Fed. Reg. 68,097 (MY2000 and older light-duty vehicles "may experience conditions affecting catalyst durability that lead to emission increases if operated on E15"); 75 Fed. Reg. 68,098 ("The Agency has reasons for concern with the use of E15 in nonroad products, particularly with respect to long-term exhaust and evaporative emissions durability and materials compatibility"); 75 Fed. Reg. 68,098 ("[W]e believe the concerns expressed above regarding MY2000 and older motor vehicles are also applicable to the majority of the in-use fleet of heavy-duty gasoline engines and vehicles.").

Any proposal by the Dept of Agriculture that would impose a fuel pump labeling requirement for manganese would create a clear question of federal preemption. Any such control, if adopted, would contravene EPA's published determination that no labeling is required, nor would it be "identical" to EPA's "control" of manganese in unleaded conventional gasoline. For this reason, among others, no other state in the U.S. has imposed, or attempted to impose, a fuel pump labeling requirement for any conventional gasoline containing manganese.

Warranty Requirements

U.S. federal law requires automobile companies to manufacture vehicles that will comply with federal performance standards using all legally permissible fuels, including those containing manganese. Nevertheless, a number of automakers have made recommendations in vehicle owner's manuals against use of gasoline containing manganese, suggesting that use of any such gasoline could void applicable vehicle warranties. These automakers cannot deny the right of vehicle owners to operate their vehicles on any legally available fuel.

Before a gasoline can be sold at local service stations, the gasoline must first be registered for use under federal law. To obtain a registration, the gasoline must either be (a) substantially similar to the gasoline used by automakers to evaluate whether the vehicles they produce comply with emission standards under federal law; or (b) a gasoline that federal authorities have determined will not cause or contribute to emission control system failure. These requirements ensure that fuel manufacturers produce and market gasoline that is fully compatible with vehicle technology.

Federal law imposes a similar requirement on automakers. Under section 207 of the U.S. Clean Air Act, automakers must warrant to their customers that the vehicles they produce (1) are designed, built, and equipped so as to conform at the time of sale with all applicable federal performance requirements; and (2) are free from defects that would cause the vehicle to fail to meet federal performance requirements for the vehicle's useful life. These warranties mean, in turn, that automakers must produce vehicles that are compatible with all legally permissible fuels. *See, e.g.*, 40 C.F.R. 86.1701-99(d) (vehicles must "be able to operate on any fuels, including conventional gasoline, that . . . could be sold under federal or state law").

Taken together, these requirements create a series of consumer rights regarding the use of gasoline.

- Consumers have the right to expect that all commercially available gasolines have been approved for use in their vehicles.
- Consumers have the right to expect their vehicles to meet federal performance standards using any commercially available gasoline.
- Consumers have the right to expect automakers to honor their warranties, without restriction, regardless of the brand of gasoline purchased for use in their vehicles.
- Consumers have the right to resist efforts by automakers to shift to consumers the cost of complying with federal performance standards.

In short, consumers can purchase commercially available gasoline of their choice, including those containing manganese, and automakers must honor warranties to the consumer during applicable warranty periods.

Dear Mr. Jones,

Chevron can not support the proposed language because, in our opinion, it does not provide adequate warning to the consumer regarding the potential presence of manganese in the gasoline being purchased.

Chevron recommends that, at a minimum, the dispenser label language be augmented as follows:

May Contain Manganese (MMT) Consult Your Owner's Manual

The above recommendation implies that the presence of manganese should be noticed in the Product Transfer Documentation (e.g., Bills of Lading) furnished along the way as the fuel travels through the distribution system.

We assume that this requirement will be in place only when manganese has been intentionally added to gasoline.

We appreciate the opportunity to comment on the LCB-approved language.

Thank you,

Nick

Nick Economides

Nick Economides
Manager, State Fuels Regulations
Chevron Global Downstream Technology
6001 Bollinger Canyon Road
San Ramon, CA 94583
925-842-5054 (office)
925-336-1720 (cell)



Estimate

Page 1 of 2

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Estimate Date: 1/15/2013 10:44:50AM
Entered By: Nikki Bomagat
Salesperson: Nikki Bomagat

Prepared For: I3 Public Affairs, LLC

Contact: Peter Krueger
Email: peter@i3publicaffairs.com

Office Phone: (775) 348-1888

Cell Phone: (775) 721-6888

TWO QUANTITIES LISTED

**

Thank you for the opportunity to quote on this project. Production time on this job is 9-12 business days. If you have any questions, I can be reached at 775-829-7446. I look forward to hearing from you soon.
Nikki

4' x4' Attention / Manganese decals

Item #	Product	Quantity	Regular Price	Unit Price	Subtotal
1	DP-Decals	1000	\$3,750.00	\$3.75	\$3,750.00
Description: DP-Decals 2 Yellow with two color imprint, permanent adhesive, for outdoor use #839 laminated					

Quantity: 1000

Side(s): Single Sided

Product Code: DP-Decals2

Height: 4 in Width: 4 in

Background Color: Yellow Foreground Color: Red/Black Font: block

Text: [per sample]

ATTENTION BEFORE YOU PUMP!

Check your owner's manual before fueling!

*Gasoline sold here may contain manganese or MMT

* Some automakers recommend against using fuel containing manganese or MMT

* Resulting damage may not be covered by warranty

ATTN: Peter Krueger
I3 Public Affairs, LLC
200 S. Virginia St. Ste 825
Reno, NV 89501

☐ Estimate Accepted As Is. Please proceed with Order.

☐ Changes required, please contact me.

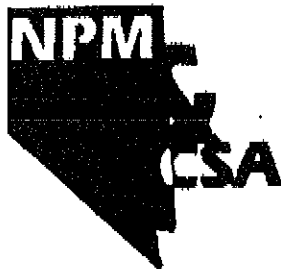
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Tom Cotrell.....1992/94
Art Hinckley.....1990/92
John Haycock.....1988/90
* Jim Smitten.....1986/88
Jon Madsen.....1985/86
* Darwin Pilger.....1983/85
Jim Kurlisa.....1982/83
Clair Haycock.....1981/82
* Archie Lani.....1980/81
Cort Bishop.....1979/80
* Archie Lani.....1978/79

*Deceased

FAX TRANSMITTAL COVER SHEET

DATE: 1/24/13

TO: Mr. David Jones

Fax Number: (775)

FROM: Peter Krueger, State Executive

Total number of pages including this sheet 2

Comments: This is the estimate to produce
1000 dispenser labels from a
Reno company